

CLERK'S OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA

DEC 12 2007

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION  
DECEMBER 2007 SESSION

JOHN F. CORCORAN, CLERK  
BY: *[Signature]*  
DEPUTY CLERK

UNITED STATES OF AMERICA : **SUPERSEDING INDICTMENT**  
:   
v. : Criminal No.: 5:07cr00038  
:   
MICHAEL WAYNE ANDERSON : **In violation of:**  
: 18 U.S.C. § 2252A(a)(1),  
: 2252A(a)(2), 2252A(a)(5)(B),  
: 2252A(b)(1), 2252A(b)(2), and 2

**Count One**

The Grand Jury charges:

That on or about March 15, 2007, in the Western Judicial District of Virginia and elsewhere, the defendant, MICHAEL WAYNE ANDERSON, having previously been convicted of a prior offense as defined in Title 18, United States Code, Section 2252A(b), did knowingly aid and abet the transportation or shipment, or did knowingly attempt to aid and abet the transportation or shipment, in interstate commerce by means of a computer, child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), in that the defendant transmitted to another person, by computer, in interstate commerce, the following links to digital images of child pornography (portions of the links have been redacted by insertion of a series of asterisks):

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*/\\*\\*\\*/1173981524789.jpg](http://***.***.*****.**/~*****/***/***/1173981524789.jpg);  
[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*/\\*\\*\\*/1173979900580.jpg](http://***.***.*****.**/~*****/***/***/1173979900580.jpg);  
[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*/\\*\\*\\*/1173976896467.jpg](http://***.***.*****.**/~*****/***/***/1173976896467.jpg); and

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*/\\*\\*\\*/1173974997507.jpg](http://***.***.*****.**/~*****/***/***/1173974997507.jpg).

In violation of Title 18, United States Code, Sections 2252A(a)(1), and 2252A(b)(1), and 2.

**Count Two**

The Grand Jury charges:

That on or about March 16, 2007, in the Western Judicial District of Virginia and elsewhere, the defendant, MICHAEL WAYNE ANDERSON, having previously been convicted of a prior offense as defined in Title 18, United States Code, Section 2252A(b), did knowingly aid and abet the transportation or shipment, or did knowingly attempt to aid and abet the transportation or shipment, in interstate commerce by means of a computer, child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), in that the defendant transmitted to another person, by computer, in interstate commerce, the following links to digital images of child pornography (portions of the links have been redacted by insertion of a series of asterisks):

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*\\*\\*/1.htm](http://***.***.*****.**/~*****/*****/1.htm);

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*\\*\\*/1169791480253.jpg](http://***.***.*****.**/~*****/*****/1169791480253.jpg); and

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*\\*\\*/src/1169876996556.jpg](http://***.***.*****.**/~*****/*****/src/1169876996556.jpg).

In violation of Title 18, United States Code, Sections 2252A(a)(1), and 2252A(b)(1), and 2.

**Count Three**

The Grand Jury charges:

That on or about March 15, 2007, in the Western Judicial District of Virginia and elsewhere, the defendant, MICHAEL WAYNE ANDERSON, having previously been convicted of a prior offense as defined in Title 18, United States Code, Sections 2252A(b), did knowingly aid and abet the receipt, or did knowingly attempt to aid and abet the receipt, by another, of child pornography or material that contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been transported in interstate commerce, by transmitting to another person, by computer, in interstate commerce, the following links to digital images of child pornography (portions of the links have been redacted by insertion of a series of asterisks):

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*.\\*\\*\\*.\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*/\\*\\*\\*/1173981524789.jpg](http://***.***.***.***.*/~*****/***/***/1173981524789.jpg);  
[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*.\\*\\*\\*.\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*/\\*\\*\\*/1173979900580.jpg](http://***.***.***.***.*/~*****/***/***/1173979900580.jpg);  
[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*.\\*\\*\\*.\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*/\\*\\*\\*/1173976896467.jpg](http://***.***.***.***.*/~*****/***/***/1173976896467.jpg); and  
[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*.\\*\\*\\*.\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*/\\*\\*\\*/1173974997507.jpg](http://***.***.***.***.*/~*****/***/***/1173974997507.jpg).

In violation of Title 18, United States Code, Sections, 2252A(a)(2), and 2252A(b)(1), and 2.

**Count Four**

The Grand Jury charges:

That on or about March 16, 2007, in the Western Judicial District of Virginia and elsewhere, the defendant, MICHAEL WAYNE

ANDERSON, having previously been convicted of a prior offense as defined in Title 18, United States Code, Sections 2252A(b), did knowingly aid and abet the receipt, or did knowingly attempt to aid and abet the receipt, by another, of child pornography or material that contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been transported in interstate commerce, by transmitting to another person, by computer, in interstate commerce, the following links to digital images of child pornography (portions of the links have been redacted by insertion of a series of asterisks):

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*\\*\\*/1.htm](http://***.***.*****.*/~*****/*****/1.htm);

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*\\*\\*/1169791480253.jpg](http://***.***.*****.*/~*****/*****/1169791480253.jpg); and

[http://\\*\\*\\*.\\*\\*\\*.\\*\\*\\*\\*\\*.\\*/~\\*\\*\\*\\*\\*/\\*\\*\\*\\*\\*/src/1169876996556.jpg](http://***.***.*****.*/~*****/*****/src/1169876996556.jpg).

In violation of Title 18, United States Code, Sections 2252A(a)(2), and 2252A(b)(1), and 2.

**Count Five**

The Grand Jury charges:

That on or about March 17, 2007, in the Western Judicial District of Virginia and elsewhere, the defendant, MICHAEL WAYNE ANDERSON, having previously been convicted of a prior offense as defined in Title 18, United States Code, Sections 2252A(b), did knowingly possess or attempt to possess material containing images

of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), that is, one or more of the following digital images and movie file that had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer, or that was produced using materials that had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer:

Documents and Settings\Dad\My Documents\ICQ Lite\219476583  
IMG\_1708.jpg;

DriveFreeSpace0137>>JPEG\_7127040[578854].jpg

DriveFreeSpace0089>>JPEG\_4040456[578806].jpg;

DriveFreeSpace2126>>JPEG\_12353536[580843].jpg;

Documents and Settings\All Users\Application Data\Symantec\  
LiveUpdate\Log.LiveUpdate.bak>>JPEG\_2609152[516364].jpg; and

Documents and Settings\Dad\My Documents\nelia\22\_nelia.mpg

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

#### **Count Six - Forfeiture**

Upon conviction for violating Title 18, United States Code, Section 2252A, defendant, MICHAEL WAYNE ANDERSON, shall forfeit to the United States any and all matter which contains visual depictions, produced, transported, mailed, shipped, or received in violation thereof; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation(s); and any and all property used or intended

to be used in any manner or part to commit and to promote the commission of the aforementioned violation(s), including but not limited to the following:

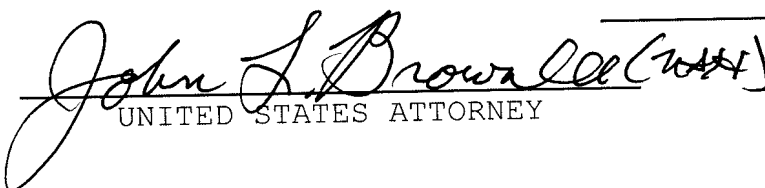
1. All such material containing the above-described visual depictions;

2. Any computer that was used by MICHAEL WAYNE ANDERSON to commit and to promote the commission of the aforementioned violation(s), including but not limited to a generic computer tower without brand, model, or serial number, with case containing label "Powered by Asus" and containing a Western Digital 120 GB hard disk, model WD1200BB-00GUA0, serial number WCALA 1185926; and a HP laptop computer, model Agency Series PP2080/Compaq nx7010, serial number CND4420Y6X, containing a Hitachi 60 GB hard disk, model HTS428060F9AT00, serial number WMHJA34MS708.

3. Any software, computer storage devices, or other materials used to commit and to promote the commission of the aforementioned violation(s).

In violation of Title 18, United States Code, Section 2253.

A TRUE BILL, this 12 day of December 2007.

  
UNITED STATES ATTORNEY

  
FOREPERSON